

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
CORPUS CHRISTI DIVISION

MARC VEASEY, *et al*,

Plaintiffs,

VS.

RICK PERRY, *et al*,

Defendants.

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CIVIL ACTION NO. 2:13-CV-00193

**DEFENDANTS' SECOND AMENDED NOTICE OF INTENTION TO TAKE  
ORAL DEPOSITION OF THE UNITED STATES CITIZENSHIP AND  
IMMIGRATION SERVICES**

To: **The United States of America**, by and through its attorneys of record Anna Baldwin, Robert Berman, Richard Dellheim, Elizabeth S. Westfall, Avner Shapiro, Daniel Freeman, Jennifer Maranzano, John A. Smith, Meredith Bell-Platts, and Bruce Gear, Voting Section, Civil Rights Division, United States Department of Justice, Room 7254 NWB, 950 Pennsylvania Avenue, N.W., Washington, D.C. 20530.

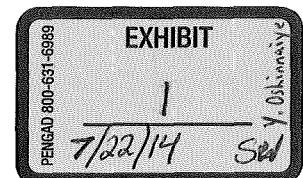
Please take notice that on July 22, 2014, beginning at 2:00 P.M. EDT, at 1800 G Street, NW, 7<sup>th</sup> Floor Conference Room, Washington, DC, Defendants the State of Texas, Rick Perry, the Texas Secretary of State<sup>1</sup> and Steve McCraw, by and through the Attorney General for the State of Texas, will take the oral deposition of the United States Citizenship and Immigration Services, pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure.

This deposition will be recorded by stenographic means, conducted before an individual authorized to administer oaths, and used for any purpose permitted under the Federal Rules of Civil Procedure or court order. The deposition may be

<sup>1</sup> Various complaints identify the Texas Secretary of State as John Steen. The current Secretary of State, however, is Nandita Berry.

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videotaped. The deposition will continue from time to time and place to place until concluded.

The United States Citizenship and Immigration Services is directed to designate a person or persons to testify on its behalf on the matters identified in Exhibit A.

## EXHIBIT A

### DEFINITIONS

The following terms have the following meanings, unless the context requires otherwise:

1. Person. The term “person” means any natural person, a business, a legal or governmental entity, or an association.
2. Citizenship and Immigration Services. The term “Citizenship and Immigration Services” means the United States Citizenship and Immigration Services and its agents, representatives, attorneys, experts, employees, officers, directors, or any other person acting or purporting to act on its behalf.
3. And & or. The connectives “and” and “or” should be construed either conjunctively or disjunctively as necessary to bring within the scope of the discovery request all responses that might otherwise be construed to be outside its scope.
4. Present. The term “Present” means May 14, 2014, or the date on which the oral deposition of the United States of America is taken in the above-captioned litigation.
5. Relating. The term “Relating” means concerning, referring, describing, evidencing, supporting, refuting, or constituting, either directly or indirectly.
6. Requirement. The term “Requirement” means any regulation, statute, guideline, common law, or other legal authority.
7. Electronically Stored Information. The term “electronically stored information” means electronic information that is stored in a medium from which it can be retrieved and examined. It includes, but is not limited to, all electronic files that can be retrieved from electronic storage.
  - a. “Electronic file” includes, but is not limited to, the following: electronic documents; e-mail messages and files; deleted files; temporary files; and metadata.
  - b. “Electronic information system” refers to a computer system or network that contains electronic files and electronic storage.
  - c. “Electronic storage” refers to electronic files contained on magnetic, optical, or other storage media, such as hard drives, flash drives, DVDs, CDs, tapes,

cartridges, floppy diskettes, smart cards, integrated-circuit cards (e.g., SIM cards).

8. Texas Law. The term “Texas law” includes, but is not limited to:
  - a. Texas Election Code § 63.0101;
  - b. Texas Administrative Code §§ 15.181–.185; and
  - c. Senate Bill 14, 82nd Leg., R.S., ch. 123, § 3, 2011 Tex. Gen. Laws 619.
9. SB 14. The term “SB 14” means Senate Bill 14, 82nd Leg., R.S., ch. 123, § 3, 2011 Tex. Gen. Laws 619.
10. Defendants. The term “Defendants” means the defendants named in the above styled and captioned lawsuit.

MATTERS

1. Any and all databases in the possession, custody, or control of the Citizenship and Immigration Services used to conduct a match with any database produced by the Defendants in this lawsuit.
2. With regard to a database described in Matter #1, above, any fields containing the same types of identifying information found in the Texas Election Administration Management System (TEAM) database that was produced by the Defendants in this lawsuit.
3. With regard to a database described in Matter #1, above, the frequency and process by which such a database is maintained and updated.
4. With regard to a database described in Matter #1, above, the process by which the Citizenship and Immigration Services used such a database to match with the Texas Election Administration Management System (TEAM) database. This topic includes any algorithm used to conduct such a match.
5. Documents, electronically stored information, codes, manuals, or software necessary to facilitate the use of a database described in Matter #1, above.
6. The requirements, standards, and protocols for obtaining an acceptable form of ID under SB 14 issued by the Citizenship and Immigration Services.

Dated: July 15, 2014

Respectfully submitted,

GREG ABBOTT  
Attorney General of Texas

DANIEL T. HODGE  
First Assistant Attorney General

JONATHAN F. MITCHELL  
Solicitor General

J. REED CLAY, JR.  
Special Assistant and Senior Counsel  
to the Attorney General  
Southern District of Texas No. 1160600

/s/ John B. Scott  
JOHN B. SCOTT  
Deputy Attorney General for Civil Litigation  
Southern District of Texas No. 10418  
Texas State Bar No. 17901500  
ATTORNEY-IN-CHARGE

G. DAVID WHITLEY  
Assistant Deputy Attorney General  
Southern District of Texas No. 2080496

STEPHEN RONALD KEISTER  
Assistant Attorney General  
Southern District of Texas No. 18580

JENNIFER MARIE ROSCETTI  
Assistant Attorney General  
Southern District of Texas No. 224780

LINDSEY ELIZABETH WOLF  
Assistant Attorney General  
Southern District of Texas No. 2292940

FRANCES WHITNEY DEASON  
Assistant Attorney General  
Southern District of Texas No. 2302872

209 West 14th Street  
P.O. Box 12548  
Austin, Texas 70711-2548  
(512) 475-0131

BEN A. DONNELL  
Donnell, Abernethy & Kieschnick  
555 N. Carancahua, Suite 1770  
Corpus Christi, Texas 78401-0853  
Southern District of Texas No. 5689

COUNSEL FOR THE STATE OF TEXAS,  
RICK PERRY, JOHN STEEN, and STEVE  
MCCRAW

**CERTIFICATE OF SERVICE**

I hereby certify that on July 15, 2014, a true and correct copy of the foregoing document is being served via electronic mail to all counsel of record.

/s/ John B. Scott  
JOHN B. SCOTT